

## ACTION PLAN FOR AER DECISION 2009-073

### ALTAGAS LTD.

#### APPLICATIONS FOR TWO PIPELINES, A FACILITY AMENDMENT, AND AN ACID GAS DISPOSAL SCHEME, POUCE COUPE FIELD

ACTION ITEM	REQUIRED ACTION/COMMENTS	DECISION: 2009-073	AER PROCESS TO ENSURE FOLLOW-UP	STATUS & EVIDENCE
1 Annual Progress Report	Annual progress reports and presentations will be a condition of approval, and any issues in the operations will be examined either when they occur or in the annual reviews, depending on the significance of the issue.	Section: 5.3.3 Paragraph 3 P. 31	AltaGas is required to provide annual progress reports and presentations.	Ongoing - This action item will continue to be monitored by the AER through the Acid Gas Disposal Approval No. 11460 and AltaGas is not required to provide further updates to this action plan. This action plan is now closed.  2013 annual report submitted on May 8, 2014. 2012 annual report submitted on February 28, 2013.
2 Packer Isolation Testing	The ERCB also requires all operators of acid gas disposal wells to conduct a packer isolation test yearly to confirm the integrity of the annular system and the Board will require such annual tests in AltaGas's case.	Section: 5.4.3 Paragraph 2 P. 32	Annual tests to be provided to the Board.	Ongoing - This action item will continue to be monitored by the AER through the Acid Gas Disposal Approval No. 11460 and AltaGas is not required to provide further updates to this action plan. This action plan is now closed.  2014 test completed July 30, 2014 and reported August 28, 2014 2013 test completed August 26, 2013 and reported August 28, 2013 2012 test completed July 9, 2012 and reported July 18, 2012 2010 test completed July 25, 2010 and reported July 28, 2010
3 Pressure Test	Conducting a bottomhole pressure test in the Belloy Formation at the injection well once every four years during plant shutdowns should provide a good understanding of the reservoir's capacity and help ensure that the maximum reservoir pressure defined in the approval is not exceeded.	Section: 5.4.3 Paragraph 3 P. 33	Pressure test results to be provided to the Board.	Ongoing - This action item will continue to be monitored by the AER through the Acid Gas Disposal Approval No. 11460 and AltaGas is not required to provide further updates to this action plan. This action plan is now closed.  The test was submitted on September 29, 2014.

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4 Cement Bond Logs	The Board will require AltaGas to run cement bond logs at Signalta's 10-11 and 11-12 wells before injection commences and to prove acid gas will be contained to the disposal zone if it reaches there.	Section: 5.4.3 Paragraph 5 P. 33	AltaGas is required to provide the logs to the ERCB.	Completed - ERCB reviewed the cement bond logs and confirmed effective isolation on July 20, 2010
5 SO2 Modelling Report	The Board will require that AltaGas demonstrate that the AAAQO will be met by providing additional modelling that accounts for terrain effects or modelling based on a different flare system and operational controls capable of achieving the AAAQO.	Section: 6.1.3 Paragraph 2 P. 36	AltaGas to provide additional revised modelling to the Board.	Completed - February 10, 2010 Modelling submitted to the Board.
6 Advise of Flaring Events greater than two hours	The Board requires AltaGas to advise the ERCB of any flaring events greater than two hours until AltaGas can demonstrate to the satisfaction of the ERCB that it can limit flaring.	Section: 6.2.3 Paragraph 1 P. 38	AltaGas will advise the Board of these flaring events.	Completed - The AER is satisfied that AltaGas has sufficiently demonstrated its commitment to limited and reduced flaring and therefore AltaGas has fulfilled this condition.
7 Flaring Report every six months	AltaGas is also required to provide the ERCB with a report every six months, until a lesser frequency is stipulated, that demonstrates that the measures AltaGas is undertaking are effective in reducing flare volumes and frequency.	Section: 6.2.3 Paragraph 1 P. 38	AltaGas will provide a flaring report to the Board as stipulated.	Completed - The AER is satisfied that AltaGas has sufficiently demonstrated its commitment to limited and reduced flaring and therefore AltaGas has fulfilled this condition.  Flaring reports received for the six month periods ending - May 31, 2013 - Nov 30, 2012 - May 31, 2012 - Nov 30, 2011 - May 31, 2011 - Nov 30, 2010 - May 31, 2010
8 Public Consultation	The Board directs AltaGas to undertake a full and complete consultation and notification program, as detailed in Section 4 of Directive 071. Detailed public involvement documentation for each resident is to be updated on the issues or concerns expressed by the interveners and is to be included in the confidential copy of the updated ERP that AltaGas is required to submit to the ERCB.	Section: 6.3.3 Paragraph 9 P. 43	The ERCB will review the ERP to ensure this condition is met.	Completed - AltaGas submitted an updated ERP that was approved by the ERCB on May 21, 2010.

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9 Public Information Package	A new public information package is to be developed and delivered to the residents, as required by Directive 071, during AltaGas's consultation efforts.	Section: 6.3.3 Paragraph 10 P. 44	The ERCB will review the ERP to ensure this condition is met.	Completed - AltaGas submitted an updated ERP that was approved by the ERCB on May 21, 2010.
10 Update to ERP – Road conditions	Pertinent aspects of the municipal development approval agreement, specifically the mitigative measures taken to ensure the viability of the road during winter months, are to be included within the updated ERP that AltaGas is required to submit for approval.	Section: 6.3.3 Paragraph 13 P. 44	The ERCB will review the ERP to ensure this condition is met.	Completed - AltaGas submitted an updated ERP that was approved by the ERCB on May 21, 2010.
11 Update ERP – Livestock concerns	Should livestock health and safety concerns be expressed by the residents when AltaGas re-conducts its consultation program, these concerns are to be discussed with them and included in the public involvement documentation provided to the ERCB in its confidential copy of its ERP.	Section: 6.3.3 Paragraph 15 P. 44	The ERCB will review the ERP to ensure this condition is met.	Completed - AltaGas submitted an updated ERP that was approved by the ERCB on May 21, 2010.
12 ERP Exercise prior to operations	The Board will impose a condition that an ERP exercise be held prior to the commencement of the applied-for operations.	Section: 6.3.3 Paragraph 17 P. 45	AltaGas will notify the Board as to when the ERP exercise will take place.	Completed - May 7, 2010 The ERCB's EPA Section has confirmed that this condition has been fulfilled.
13 ERP Exercise to test egress routes	The Board requires that AltaGas design its exercise to test the effectiveness of the egress routes for area residents, as well as emergency response resources response times and availability, and expects that key concerns identified by the interveners will be incorporated.	Section: 6.3.3 Paragraph 17 P. 45	The ERCB will review the ERP exercise to ensure this condition is met.	Completed - November 25, 2010 Confirmation that ERP exercise was completed
14 ERP Exercise scheduled date - Notification to EPA	In addition to notification of the ERCB through the Digital Data Submission notification process required for major ERP exercises, AltaGas is to directly notify the Emergency Planning and Assessment Section of the ERCB of the scheduled date of the exercise, allowing sufficient time for ERCB staff to attend the exercise.	Section: 6.3.3 Paragraph 18 P. 45	ERCB staff will attend the ERP exercise.	Completed - The EPA Section was informed and this condition was completed on May 5, 2010.

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15 Post ERP Exercise Report	Within 60 days of holding the ERP exercise, AltaGas is required to submit a post-exercise results report to the ERCB Grande Prairie Field Centre, where it will be available for public viewing.	Section: 6.3.3 Paragraph 19 P. 45	ERP Post-exercise results report to be submitted to the Board.	Completed - November 25, 2010 ERCB Grande Prairie Field Centre confirmed receipt of report

*The conditions imposed in approvals/licence(s) are monitored by the Alberta Energy Regulator (AER). The AER has developed a process whereby an action plan is developed internally to ensure that AER staff monitor conditions arising from decision reports for compliance. The conditions are managed in an action plan that is updated quarterly with statuses of conditions. The action plan defines the action required, timeframes for completion, and a summary of the evidence provided to confirm a condition was met. For more information, please contact the Action Plan Administrator at (403) 297-4289.*